

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Twana Ahmed,

Plaintiff,

V.

**Universal Protection Service, LP,
d/b/a Allied Universal Security
Services**

Defendant.

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CIVIL ACTION NO. 4:23-cv-02823

## Jury Trial Demanded

**PLAINTIFF TWANA AHMED'S MOTION  
TO USE JUROR QUESTIONNAIRE**

Through his undersigned counsel, Plaintiff Twana Ahmed attaches hereto a proposed juror questionnaire. He does so for the convenience of the Court. He does so to save time and resources in jury selection. He requests that it be given to venire panel members before they are brought to the courtroom for examination. He requests that answers be distributed to counsel for the parties before voir dire examination. He notes that it is substantially in the same form as that Judge Sean Jordan used to try another recent race discrimination case—*Yarbrough v. Glow Networks, Inc.*, No. 19-cv-00905 (E.D. Tex.). It is adopted from one the American Board of Trial Advocates (“ABOTA”) publishes.

Respectfully submitted,

/s/Amanda C. Hernandez

Amanda C. Hernandez

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**CERTIFICATE OF CONFERENCE**

In accordance with Local Rule 7.1(D), I certify that I have attempted to conference with defense counsel regarding this motion. I gave adequate time for response—two weeks. I first requested consideration on July 18, 2025. I followed-up on July 25, 2025. I followed up again on July 30, 2025. I have received no response.

/s/Amanda C. Hernandez  
Amanda C. Hernandez

**CERTIFICATE OF SERVICE**

The undersigned certifies that on August 1, 2025, *Plaintiff Twana Ahmed's Motion to Use Juror Questionnaire* was filed via the Court's CM/ECF system, serving Defendant's attorneys of record as follows:

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# EXHIBIT A

## JUROR QUESTIONNAIRE

Juror Name: \_\_\_\_\_

Juror # \_\_\_\_\_

|                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                               |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>1. Name:</p> <p>Age:</p>                                                                                                                                                                                                             | <p>2. Highest grade you completed in school?</p> <p>If college, please list any degrees received and major area of study:</p>                                                                                                           | <p>3. If you or a loved one were seriously harmed by someone's negligence, would you file a lawsuit?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO</p>                                                                                      |
| <p>4. Who is your current employer?</p> <p>What is your job title and duties:</p> <p>Type of business:</p> <p>How long have you worked there?</p>                                                                                       | <p>5. If retired or not working, what was your last job?</p> <p>What was your job title and duties:</p> <p>Type of business:</p> <p>How long did you work there?</p>                                                                    | <p>6. Marital/relationship status:</p> <p>Significant other's educational background:</p> <p>His/her occupation:</p>                                                                                                                                          |
| <p>7. Number of children and stepchildren and ages:</p> <p>Children's occupations:</p> <p>Parents' occupations (or previous occupations if retired or deceased):</p>                                                                    | <p>8. Which group do you identify with most?</p> <p><input type="checkbox"/> Executives<br/> <input type="checkbox"/> Managers<br/> <input type="checkbox"/> Workers</p>                                                                | <p>9. Do you believe in awarding money for mental anguish?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO</p>                                                                                                                                |
| <p>10. Have you or someone close to you ever been a Plaintiff (person suing) or Defendant (person being sued) in a civil lawsuit?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If YES, describe the case:</p> | <p>11. Have you ever owned a business or been a senior manager of a company?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If YES, what kind of business?</p> <p>Was that business ever sued?</p> <p>When?</p> | <p>12. Have you or someone close to you ever worked for or done business with Universal Protection Service, LP, d/b/a Allied Universal Security Services?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If YES, please describe:</p> |

Juror Name: \_\_\_\_\_

Juror # \_\_\_\_\_

|                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>13. In general, what is your opinion of companies?</p>                                                                                                                                                                                                       | <p>14. In general, what is your opinion of people who file lawsuits against companies?</p>                                                                                                                                                                                                       | <p>15. Companies routinely compromise safety in order to increase profits.</p> <p><input type="checkbox"/> Strongly agree<br/> <input type="checkbox"/> Agree<br/> <input type="checkbox"/> Disagree<br/> <input type="checkbox"/> Strongly disagree</p>                                       |
| <p>16. There are too many restrictions and regulations placed on companies today.</p> <p><input type="checkbox"/> Strongly agree<br/> <input type="checkbox"/> Agree<br/> <input type="checkbox"/> Disagree<br/> <input type="checkbox"/> Strongly disagree</p> | <p>17. People are too quick to blame a company if they are harmed at work, whether or not the company was at fault</p> <p><input type="checkbox"/> Strongly agree<br/> <input type="checkbox"/> Agree<br/> <input type="checkbox"/> Disagree<br/> <input type="checkbox"/> Strongly disagree</p> | <p>18. Have you or a close family member ever been terminated from work?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If YES, please explain:</p>                                                                                                                    |
| <p>19. Have you or a close family member ever been wrongfully terminated from work?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If YES, please explain:</p>                                                                          | <p>20. Have you or someone close to you ever filed a charge of discrimination with any state or federal agency?</p> <p><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If YES, when and please describe:</p>                                                                     | <p>21. Which best describes your view regarding limiting the amount of money a person can receive in civil lawsuits?</p> <p><input type="checkbox"/> Strongly favor<br/> <input type="checkbox"/> Favor<br/> <input type="checkbox"/> Oppose<br/> <input type="checkbox"/> Strongly oppose</p> |
| <p>22. There should be laws making it more difficult to file a lawsuit.</p> <p><input type="checkbox"/> Strongly agree<br/> <input type="checkbox"/> Agree<br/> <input type="checkbox"/> Disagree<br/> <input type="checkbox"/> Strongly disagree</p>           | <p>23. The amount of money awarded in lawsuits is:</p> <p><input type="checkbox"/> Often too high<br/> <input type="checkbox"/> Too high<br/> <input type="checkbox"/> Too low<br/> <input type="checkbox"/> Often too low</p>                                                                   |                                                                                                                                                                                                                                                                                                |